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*Co-lead Class Counsel and Attorneys for
Individual and Representative Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Kajan Johnson, Clarence Dollaway, and Tristan
Connelly on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

Zuffa, LLC, TKO Operating Company, LLC f/k/a
Zuffa Parent LLC (d/b/a Ultimate Fighting
Championship and UFC), and Endeavor Group
Holdings, Inc.,

Defendants.

Case No.: 2:21-cv-01189-RFB-BNW

**DECLARATION OF JOSEPH R.
SAVERI IN SUPPORT OF
PLAINTIFFS' REPLY IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL
DEFENDANT ENDEAVOR GROUP
HOLDINGS, INC., TO PRODUCE
DOCUMENTS IN RESPONSE TO
PLAINTIFFS' FIRST AND SECOND
SETS OF REQUESTS FOR
PRODUCTION AND FOR SANCTIONS**

Case No.: 2:21-cv-01189-RFB-BNW

**DECLARATION OF JOSEPH R. SAVERI IN SUPPORT OF PLAINTIFFS' REPLY IN
SUPPORT OF MOTION TO COMPEL ENDEAVOR TO PRODUCE DOCUMENTS AND
FOR SANCTIONS**

1 I, Joseph R. Saveri, declare and state as follows:

2 1. I am the founder of the Joseph Saveri Law Firm, LLP and co-lead counsel for the
3 class and attorney for individual and representative plaintiffs, Kajan Johnson, Clarence Dollaway,
4 and Tristan Connelly (collectively, "Plaintiffs"). I am a member in good standing of the California
5 Bar and have been admitted *pro hac vice* in this court. I am over 18 years of age and have personal
6 knowledge of the facts stated in this Declaration. If called as a witness, I could and would testify
7 competently to them. I make this declaration pursuant to 28 U.S.C. § 1746

8 2. I make this Declaration in support of Plaintiffs' Reply in Support of Plaintiffs' Motion
9 to Compel Defendant Endeavor Group Holdings, Inc. to Produce Documents in Response to
10 Plaintiffs' First and Second Sets of Requests for Production and for Sanctions.

11 3. Attached as **Exhibit A** is a true and correct copy of letter sent to Plaintiffs by
12 Endeavor's counsel Jessica E. Phillips on April 7, 2025.

13 4. Attached as **Exhibit B** is a true and correct copy of an email sent to Plaintiffs by
14 Defendants' counsel Robert Medina on April 23, 2025.

15 I declare under penalty of perjury under the laws of the United States of America that the
16 foregoing is true and correct. Executed on this 28 day of April, 2025.

17 /s/ Joseph R. Saveri
18 Joseph R. Saveri
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